



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

MAR 18 2004

400 Seventh Street, S.W.
Washington, D.C. 20590

Block SVC 124
Sta 108

NHTSA-04-17386-1

03 MAR 22 PM 12:54

U.S. DEPARTMENT OF TRANSPORTATION

Mr. Jeff Maharg
Engineering Manager
Tracker Marine Group
P.O. Box 760
Ozark, MO 65721

Dear Mr. Maharg:

This responds to your February 5, 2004, e-mail and phone conversation with George Feygin of my staff regarding certain trailer lighting requirements. Specifically, you ask whether a small (5ft. x 8ft.) trailer must be equipped with front side marker lamps. In short, our answer is yes.

By way of background, the National Highway Traffic Safety Administration (NHTSA) does not provide approvals of motor vehicles or motor vehicle equipment. Under 49 U.S.C. Chapter 301, manufacturers are required to certify that their vehicles and equipment meet applicable requirements.

With respect to your question, Table III of the Federal Motor Vehicle Safety Standard (FMVSS) No. 108 lists required lighting equipment for trailers with an overall width of less than 80 inches.¹ Table III requires that each such trailer be equipped with two red and two amber side marker lamps. Table IV specifies the location of the required lighting listed in Table III. With respect to side marker lamps on trailers, Table IV mandates that one red side marker be located as far to the rear as practicable, and one amber side marker be located as far to the front as practicable, on each side of the trailer. Accordingly, your trailer must be equipped with two amber side marker lamps located on each side of the trailer as far to the front as practicable.

From the attached pictures of your trailer, it is unclear whether it is equipped with rear red side marker lamps. Further, the front amber side markers do not appear to be located "as far to the front as practicable." Finally, we note that your trailer

¹ Your e-mail and attached photos indicate that your trailer width is approximately 5 ft (60 inches).

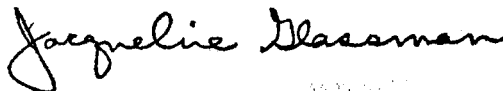


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must also be equipped with red and amber reflex reflectors that are either incorporated into side marker lamps or located adjacent to the side marker lamps. The amber reflex reflector that appears to be mounted on the wheel cover does not satisfy this requirement. In order to satisfy FMVSS No. 108, you must install all required lighting in the correct location.

I hope you find this information helpful. If you need further assistance, please contact George Feygin of my staff at this address or at (202) 366-2992.

Sincerely,

A handwritten signature in black ink that reads "Jacqueline Glassman". The signature is written in a cursive, flowing style.

Jacqueline Glassman
Chief Counsel